REMARKS

Summary of the Office Action

Claims 12-17 are objected to because of informalities.

Claims 12-17 are rejected under 35 U.S.C. § 102(b) as being anticipated by Hatano et al.

(EP 0 935 123 A2) (hereinafter "Hatano").

Should claim 12 be found allowable, claim 17 will be objected to under 37 C.F.R. § 1.75

as being a substantial duplicate thereof.

Summary of the Response to the Office Action

This Preliminary Amendment is being filed concurrently with a Request for Continued

Examination. In accordance with 37 C.F.R. § 1.114(c), it is respectfully submitted that this

Preliminary Amendment meets the reply requirement of 37 C.F.R. § 1.111 with respect to the

Final Office Action dated January 6, 2006, as will be discussed more fully below.

Applicant has amended claims 12-17.

Claims 12-17 are pending.

Matters of Form

Claims 12-17 are objected to because of informalities. Applicant respectfully traverses

the objections. Applicant has amended claims 12-17 to address the Examiner's concerns

described at paragraphs 3 and 5 of the Office Action. Withdrawal of the objections is requested.

Should claim 12 be found allowable, claim 17 will be objected to under 37 C.F.R. § 1.75

as being a substantial duplicate thereof. Applicant respectfully traverses any such objection.

Claim 12 recites means plus function limitations, in contrast to claim 17. Such means plus function limitations are interpreted differently than limitations without means plus function language. Means-plus-function limitations allow a patentee to claim a structure (or method step) by using purely functional language. However, not all structures that perform the recited function are literally covered by the claim limitations. Instead, only the "corresponding" structure disclosed in the patent specification and equivalents thereof are covered. *See* 35 U.S.C. § 112, paragraph 6. If the word "means" appears in a limitation in association with a function, a presumption arises that Section 112, paragraph 6 "means-plus-function" treatment applies. *See Micro Chem., Inc. v. Great Plains Chem. Co.,* 194 F.3d 1250, 1257 (Fed. Cir. 1999). The "corresponding" structure includes only the structure in the written description that (1) is necessary to perform the claimed function, and (2) is clearly linked to the claimed function. *Id.* at 1257-58; *Medtronic, Inc. v. Advanced Cardiovascular Sys., Inc.,* 248 F.3d 1303, 1306-07, 1308 (Fed. Cir. 2001). A means-plus-function limitation also literally covers all "equivalents" of the corresponding structure. *See* 35 U.S.C. §112 paragraph 6. The test for determining equivalence under section 112 paragraph 6 is whether the differences between the structure in the accused device and the "corresponding" structure disclosed in the specification are "insubstantial." *IMS Tech., Inc. v. Haas Automation, Inc.,* 206 F.3d 1422, 1435 (Fed. Cir. 2000).

Accordingly, Applicant submits that claim 17 is not a substantial duplicate of claim 12, and requests that the objection in this regard be withdrawn.

All Claims Define Allowable Subject Matter

Applicant respectfully thanks the Examiner for courtesies extended during the Examiner

Interview at the U.S. Patent and Trademark Office on May 8, 2006 between Examiner Jakieda

Jackson, Examiner Talivaldis Smitst, Mr. Mitsuhiro Yamaha of Pioneer Corporation, and Peter J.

Sistare. The substance of the Interview is captured below.

Claims 12-17 are rejected under 35 U.S.C. § 102(b) as being anticipated by Hatano.

Applicant respectfully traverses the rejection under 35 U.S.C. § 102(b). Claim 12 recites a

speech recognition unit, including a plurality of hierarchically stored speech recognition

dictionaries, extracting means for extracting the contents of specific dictionaries as a list of

queuing words, storage means for temporarily storing the extracted list of queuing words, and

recognition means for recognizing an input speech command by comparing the input speech

command and the list of queuing words stored in the storage means. The speech recognition unit

includes setting means for permitting a user to preset a narrowing-down condition. The

extracting means extracts a dictionary at the <u>highest</u> level of the hierarchy and a dictionary

associated with the narrowing-down condition preset by the user as the list of queuing words

from the plurality of hierarchically stored speech recognition dictionaries when a recognition

process starts. Support for claim 12 is provided at, for example, page 4, line 17 – page 5, line 1;

page 17, line 11 – page 18, line 12; and Fig. 3, of Applicant's specification. In the embodiment

of the invention shown and described, in retrieving a speech recognition dictionary having a

hierarchical structure, a recognition process is also applied to one or more institutional name

dictionaries set by a user beforehand (*e.g.* dictionaries classified according to a narrowing-down

condition, and illustrated as a dictionary of hospitals and a dictionary of accommodations in the

hierarchical dictionary tree shown in Fig. 3) together with a first narrowing-down condition

·dictionary (e.g. a category name dictionary in the hierarchical dictionary tree shown in Fig. 3) at

a first hierarchy as an object of recognition.

If a user sets a narrowing-down condition as a category and an institutional name

frequently used by a user beforehand, a target institutional name that is matched with the

narrowing-down condition can be retrieved by one vocalization without the troublesome

processing associated with a hierarchical structure that is sequentially followed. As a narrowing-

down condition dictionary is also simultaneously an object of recognition, even an institutional

name which is not matched with the narrowing-down condition set beforehand can be retrieved

according to a conventional type procedure wherein the hierarchical structure is sequentially

followed.

As described at paragraph 0035, and illustrated in Fig. 1 of Hatano, an internal dictionary

may be stored in a DVD-ROM disk DK and read out by a DVD-ROM drive 11. As described at

paragraphs 0038 and 0039, place names or facility names that are frequently set as a destination

spot may be selected and registered, in advance, in the RAM 8. In addition, place names or

facility names which have been retrieved recently and set as a destination spot may be stored in

RAM 8. With reference to Figs. 2A-2B, paragraphs 0040-0079 of Hatano describe the data

structure of a request message, and the data structure of recognition words, respectively.

Paragraph 0080 provides a concrete example of the manner in which the Hatano device works.

As described at paragraph 0080, if the speech "Shinagawa-Ku" is inputted in response to the

message "Prefecture, please" in the request message SM illustrated in Fig. 2A, it is preferred to

recognize this speech input. In order to achieve this, when waiting for speech input after the

request message SM, the first hierarchy 40 corresponding to the output request message SM and

also the respective recognition words in the second, third, fourth and fifth hierarchies 41, 42, 43

and 44 associated with the recognition word W in the first hierarchy 40, may be referred to.

However, before a user may input the speech "Shinagawa-Ku" in response to the message

"Prefecture, please," a user must first respond to the request message SM "Where are you

going?" illustrated in Fig. 2A as zero hierarchy 30. The user must respond with one of

"Prefecture", "Area Code", "Registered Address", "Recently Retrieved Address" and "Genre".

The first hierarchy 40 and the respective recognition words in the second, third, fourth and fifth

hierarchies 41, 42, 43 and 44 may be referred to only after responding "Prefecture."

Thus, Applicant submits that Hatano does not teach or suggest at least the features of

extracting means that extracts a dictionary at the highest level of the hierarchy and a dictionary

associated with the narrowing-down condition preset by the user as the list of queuing words

from the plurality of hierarchically stored speech recognition dictionaries when a recognition

process starts, as recited in claim 12. Claims 13-15 depend from claim 12 and recite the same

combination of allowable features recited in claim 12, as well as additional features that define

over the prior art.

Claim 16 recites a speech recognition method for a speech recognition unit having a

plurality of hierarchically stored speech recognition dictionaries, including extracting a

dictionary at the highest level of the hierarchy and a dictionary associated with the narrowing-

down condition preset by the user as the list of queuing words from the plurality of hierarchically

stored speech recognition dictionaries when a recognition process starts. Claim 17 recites a

speech recognition unit, including an extractor that extracts a dictionary at the highest level of

the hierarchy and a dictionary associated with the narrowing-down condition preset by the user

as the list of queuing words from the plurality of hierarchically stored speech recognition

dictionaries when a recognition process starts. As described above, Hatano does not teach or

suggest these features.

Applicant respectfully requests that the rejection under 35 U.S.C. § 102(b), of claims 12-

17, be withdrawn, and the claims allowed.

CONCLUSION

In view of the foregoing, Applicant submits that the pending claims are in condition for allowance, and respectfully requests reconsideration and timely allowance of the pending claims. Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicant's undersigned representative to expedite prosecution. A favorable action is awaited.

EXCEPT for issue fees payable under 37 C.F.R. § 1.18, the Commissioner is hereby authorized by this paper to charge any additional fees during the entire pendency of this application including fees due under 37 C.F.R. § 1.16 and 1.17 which may be required, including any required extension of time fees, or credit any overpayment to Deposit Account No. 50-0573. This paragraph is intended to be a **CONSTRUCTIVE PETITION FOR EXTENSION OF TIME** in accordance with 37 C.F.R. § 1.136(a)(3).

Respectfully submitted,

DRINKER BIDDLE & REATH LLP

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Peter J. Sistare
Reg. No. 48,183

Customer No. 055694
DRINKER BIDDLE & REATH LLP
1500 K Street, N.W., Suite 1100
Washington, DC 20005-1209
Tel.: (202) 842-8800
Fax: (202) 842-8465

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